



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

September 27, 2019

Sent Via UPS

Rajiv A. Tata, Deputy General Counsel
Ducommun Incorporated
for American Electronics, Inc.
200 Sandpointe Avenue, Suite 700
Santa Ana, California 90707

Re: Supplemental Information Request Letter
Orange County North Basin Study Area, Orange County, California

Dear Rajiv Tata:

Thank you for your company's November 1, 2018 response to EPA's information request letter dated September 11, 2018. We have reviewed your response and have some follow-up questions, which can be found in the enclosure to this letter. Please note that the same definitions and instructions apply as in our previous information request letter to you.

Although we expect that you will respond to our information request voluntarily, please note that your compliance with this information request is mandated by law. Failure to respond fully and truthfully may result in an enforcement action by EPA pursuant to Section 104(e)(5) of CERCLA, 42 U.S.C. §9604(e)(5). This statutory provision authorizes EPA to seek the imposition of penalties of up to \$55,907 per day of noncompliance. Also, although we don't expect this to be an issue, please note that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. §1001. The information you provide may be used by EPA in administrative, civil, or criminal proceedings. Some of the information EPA is requesting may be considered by you to be confidential. Please be aware that you may not withhold information upon that basis. If you wish EPA to treat the information confidentially, you must advise EPA of that fact by following the procedures outlined in Enclosure A of EPA's September 11, 2018 information request, including the requirement for supporting your claim for confidentiality.

This request for information is not subject to review by the Office of Management and Budget ("OMB") under the Paperwork Reduction Act because it is not an "information collection request" within the meaning of 44 U.S.C. §§3502(3), 3507, 3512, and 3518(c)(1). See also, 5 C.F.R. §§1320.3(c), 1320.4, and 1320.6(a).

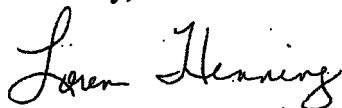
We encourage you to give this matter your immediate attention and request that you provide a complete and truthful response to this information request within thirty (30) calendar days of

your receipt of this letter. Your response should include the appropriate name, address, and telephone number of the person to whom EPA should direct future correspondence in regard to this information request. Your response to the information request should be directed to:

Kim Muratore, Case Developer (SFD-7-5)
U.S. EPA, Region 9
75 Hawthorne St.
San Francisco, CA 94105

If you have any questions regarding this letter, please contact Ms. Muratore at (415) 972-3121 or you may send her an email at muratore.kim@epa.gov. Technical questions regarding the site should be directed to the Remedial Project Manager, Kathleen Aisling, at (213) 244-1823 or aisling.kathleen@epa.gov. Questions regarding legal matters can be directed to Bethany Dreyfus at (415) 972-3886 or dreyfus.bethany@epa.gov. Thank you for your prompt attention to this matter.

Sincerely,



Loren Henning, Chief
CERCLA Enforcement Section
Superfund and Emergency Management Division

cc: Stephen G. Oswald, CEO
Ducommun Incorporated
200 Sandpointe Avenue, Suite 700
Santa Ana, California 90707

Enclosure

ENCLOSURE: QUESTIONS

1. State the full legal name, address, telephone number, email address, and position(s) held by any individual answering any of these questions on behalf of Ducommun Incorporated and its former subsidiary American Electronics, Inc. (f/k/a, American Pacesetter, Inc.).
2. As referenced in your November 1, 2018 response, provide a complete, executed copy of the 1998 Stock Purchase Agreement between American Electronics, Inc. and Ducommun Technologies, Inc. (n/k/a, Ducommun LaBarge Technologies, Inc.), including copies of all indemnification and other agreements pursuant to which the environmental liabilities of American Electronics, Inc. were transferred to or assumed by other parties. Include any and all appendices, attachments, and schedules that were part of the 1998 agreement(s).
3. State whether a liquidating trust was ever established to distribute American Electronics, Inc.'s assets. If so, state whether it currently exists and provide the following information:
 - a. The name of the liquidating trust;
 - b. The date that the trust was formed;
 - c. The name of the trustee;
 - d. Contact information for the trustee; and
 - e. An approximate current value of the total assets held by trust, as well as a list of distributions that have been made since it was formed.